

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

.....X	
IN RE:	:
	:
DEALER MANAGEMENT SYSTEMS	:
ANTITRUST LITIGATION	:
	:
Plaintiff,	:
	:
<i>This filing relates to:</i>	:
	:
ALL CASES	:
.....X	

**MOTION OF NON-PARTY SUBPOENA
RECIPIENTS XCELERATED, LLC, XCELERATED DATA LLC
AND Pensa LLC FOR PROTECTIVE ORDER AND FOR FEES AND COSTS**

Xcelerated LLC, Xcelerated Data LLC and Pensa LLC (collectively, the “Recipients”), by counsel, and pursuant to rules 26(c), 37(a)(5) and 45 of the Federal Rules of Civil Procedure (“Civil Rules”) move for entry of a protective order relieving the Recipients of any obligation to respond to a non-party subpoenas issued by Reynolds & Reynolds Company (“Reynolds”) and for fees and costs incurred in response to those subpoenas, including in prosecuting this motion. In support of their motion, the Recipients incorporate the memorandum of law filed concurrently herewith.

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Dated: June 25, 2017

Respectfully submitted,

/s/ James R. Irving

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LLC and Pensa LLC*

CERTIFICATE OF SERVICE

I hereby certify that on June 25, 2018, caused a copy the foregoing to be served electronically via the court's CM/ECF system. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing.

/s/ James R. Irving

*Counsel to Xcelerated LLC, Xcelerated Data LLC
and Pensa LLC*